

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

February 24, 2016

The Honorable Frank Maas
 United States District Court for the
 Southern District of New York
 Daniel Patrick Moynihan United States
 Courthouse
 500 Pearl Street, Room 740
 New York, NY 10007-1312

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, write to respectfully request that the existing deadline for submission of plaintiffs' motions to compel as to defendants Muslim World League ("MWL") and the International Islamic Relief Organization ("IIRO"), be extended from February 26, 2016 to April 29, 2016. Counsel for the plaintiffs and the defendants recently exchanged letters addressing a number of plaintiffs' concerns relating to the defendants' document productions and continue to exchange information to narrow the areas of disagreement. Plaintiffs have also requested a meet-and-confer to discuss the areas of disagreement and that meeting is expected to take place in March. Plaintiffs are hopeful that the continuing dialogue with the defendants will help resolve some of these ongoing disputes, thereby reducing the scope of issues requiring Your Honor's attention. Plaintiffs have conferred with counsel for the MWL and IIRO and they consent to the extension.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,



J. Scott Tarbutton, Esq.
 THE MDL 1570 PLAINTIFFS' EXECUTIVE
 COMMITTEES

The Honorable Frank Maas

February 24, 2016

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cc: MDL Counsel of Record (via ECF)

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